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**From:** David Stewart [david.stewart@capitalregionwater.com]  
**Sent:** 6/26/2020 1:58:20 PM  
**To:** Maslowski, Steven [Maslowski.Steven@epa.gov]  
**CC:** Landis, Victor [vlandis@pa.gov]; Fields, Jenifer [fields.jenifer@epa.gov]; Melvin, Karen [Melvin.Karen@epa.gov]; Rogers, Rick [rogers.rick@epa.gov]; Pratt, Stacie [Pratt.Stacie@epa.gov]; Armstrong, Joan [Armstrong.Joan@epa.gov]; Bebenek, Maria (mbebenek@pa.gov) [mbebenek@pa.gov]; Charlotte Katzenmoyer [Charlotte.Katzenmoyer@capitalregionwater.com]; Claire Maulhardt [claire.maulhardt@capitalregionwater.com]; Douglas Keith [Douglas.Keith@capitalregionwater.com]; Jess Rosentel [Jess.Rosentel@capitalregionwater.com]; Meeneghan, Terry [MeeneghanTJ@cdmsmith.com]  
**Subject:** RE: CRW Slides - 6/25/20  
**Attachments:** CBH2OPP\_Fianl Response to EPA Comments\_11-9-18\_CRW.pdf

Steve,

The tables we discussed during the call are in CRW's November 9, 2018 response to agency comments (attached), in response 22 on pages 22 and 23. I've copied all participants from yesterday's call, so everyone has the same information.

Table A shows the percentage of impervious area within each planning area that is required to achieve 4 levels of CSO control. The capture range starts with Chapter 96 of the PA Code (99% rule) and progresses through 85% capture, 20 overflows per year and 4 overflows per year. Table B shows the corresponding cost to achieve those four levels of CSO control.

Paragraph 96.3(c) of the PA code states that water quality criteria shall be achieved "at least 99% of the time." 99% of the hours in a year (8,760 hours) would be 8,672 hours, indicating that excursions of WQ standards may be permissible 1 percent of the time (87.6 hours). The model runs for the 85% capture criteria achieved 85% capture at each of the regulator structures. We are now looking at 85% capture on a systemwide basis instead, but we wanted to show you the 85% capture analyses that were performed previously.

Have a good weekend,  
Dave

**Dave Stewart, P.E., BCEE** | Director of Engineering  
888-510-0606 | 717-216-5306



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**From:** Maslowski, Steven <Maslowski.Steven@epa.gov>  
**Sent:** Thursday, June 25, 2020 5:13 PM  
**To:** David Stewart <david.stewart@capitalregionwater.com>  
**Cc:** Landis, Victor <vlandis@pa.gov>  
**Subject:** RE: CRW Slides - 6/25/20

Hi Dave,

Thank you for sending me a copy of the slides. I am not sure what Terry was talking about with the percent capture. Victor forward me the document. The copy of the document I got did not have an appendix like Terry was talking about. I did find Tables A and B, but I am not still not sure what point he was making.

Have a good weekend.

Steve Maslowski  
NPDES Section  
EPA Region III  
215-814-2371

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**From:** David Stewart <[david.stewart@capitalregionwater.com](mailto:david.stewart@capitalregionwater.com)>

**Sent:** Thursday, June 25, 2020 3:40 PM

**To:** Maslowski, Steven <[Maslowski.Steven@epa.gov](mailto:Maslowski.Steven@epa.gov)>

**Subject:** CRW Slides - 6/25/20

Steve,

As requested, attached are the slides we shared during the meeting this morning.

Regards,  
Dave

**Dave Stewart, P.E., BCEE** | Director of Engineering  
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